

JEFFREY GRONICH, ATTORNEY AT LAW, P.C.  
Jeffrey Gronich, Esq. (#13136)  
1810 E. Sahara Ave.  
Suite 109  
Las Vegas, Nevada 89104  
Tel: (702) 430-6896  
Fax: (702) 369-1290  
[jgronich@gronichlaw.com](mailto:jgronich@gronichlaw.com)  
*Attorneys for Defendants*  
NEUBLOC, LLC; AVIE HOLDINGS, LLC;  
TEQSPrING, INC; TEQNIKSOFT, LLC;  
& TRIBUTARY PUBLISHING INC.

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

KRISTINE D'ARIENZO, an individual;

**Plaintiff,**

VS.

NEUBLOC, LLC, a California limited liability company; AVIE HOLDINGS, LLC, a Nevada limited liability company; TEQSPRING, INC., a Nevada corporation; TEQNIKSOFT, LLC, a Nevada limited liability company; TRIBUTARY PUBLISHING INC., a Delaware corporation; DOES 1-10 business entities, forms unknowns; DOES 11-20, individuals; and DOES 21-30, inclusive,

### Defendants.

NEUBLOC, LLC, a California limited liability company; and TRIBUTARY PUBLISHING INC, a Delaware corporation;

#### **Counter-Plaintiffs.**

VS.

KRISTINE D'ARIENZO, an individual;

### **Counter-Defendant,**

Case No. 2:20-cv-00689-APG-EJY

## **STIPULATION AND ORDER TO EXTEND RESPONSE DEADLINE**

Jeffrey Gronich, Attorney at Law, P.C.

1810 E. Sahara Ave., Suite 109  
Las Vegas, Nevada 89104  
(702) 430-6896 FAX: (702) 369-1290

24 The Parties hereby stipulate to extend the deadline for Counter-Plaintiffs to file their

1 response to Counter-Defendant's Motion to Dismiss and agree as follows:

2       1. On May 29, 2020, Counter-Plaintiffs filed a Counterclaim against Counter-  
3 Defendant alleging fraud, conversion, unjust enrichment, and a violation of NRS 200.620.

4       2. On June 19, 2020, Counter-Defendant filed a Motion to Dismiss, with Counter-  
5 Plaintiff's Response being due on July 3, 2020.

6       3. Counter-Plaintiffs' attorney is a solo practitioner and had a pre-scheduled plan to be  
7 out of town during that time period. Accordingly, the Parties have agreed to allow Counter-  
8 Plaintiffs additional time to file their response to the Motion to Dismiss.

9       4. Accordingly, the Parties stipulate and agree that the deadline for Counter-Plaintiff  
10 to file a response to the Motion to Dismiss should be extended from July 3, 2020 to July 10, 2020.

11       5. A trial date has not yet been set in this matter and no other deadlines are affected by  
12 this stipulation.

13       6. This stipulation and order is sought in good faith and not for the purpose of delay.

14 Dated: July 25, 2020

Dated: July 25, 2020

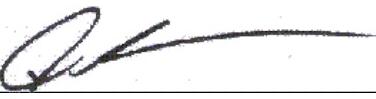
15 By: /s/ Jeffrey Gronich, Esq.  
16 Jeffrey Gronich, Esq. (#13136)  
Jeffrey Gronich, Attorney at Law, P.C.  
17 1810 E. Sahara Ave, Suite 109  
Las Vegas, NV 89104

By: /s/ Alexander M.P. Perry, Esq.  
Alexander M.P. Perry, Esq. (#14749)  
Champion Law Firm PLLC  
8965 S. Eastern Ave., Suite 120-I  
Las Vegas, NV 89123

18 Attorneys for Counter-Plaintiffs

Attorneys for Counter-Defendant

20 IT IS SO ORDERED

21   
22 \_\_\_\_\_  
23 UNITED STATES DISTRICT JUDGE  
Dated: June 25, 2020.  
24